

REMARKS

This is in response to the Final Office Action mailed June 1, 2006. Claims 14 and 21 have been amended. New claim 26 has been added. Claims 14-15, and 17-26 remain pending. Support for the claim amendments can be found throughout the application and specifically on page 6, lines 11-15 (the reference to PLURONIC N-3); and page 17 lines 20-26 (composition can be removed by vacuuming). It is believed that no new matter is presented with these amendments.

Rejections Under 35 U.S.C. § 112

The Office Action has rejected claims 14, 15, and 17-25 under 35 U.S.C. § 112, first paragraph as failing to comply with the written description requirement. Applicant respectfully traverses this rejection.

Applicant has amended claim 14 to call out that the EO/PO copolymer is a reverse copolymer.

Applicant has also amended claim 14 to delete the word “substantially”. Claim 14 as amended now states that the composition is free of enzymes.

Finally, Applicant has amended claim 21 to now call out alkyl-, aryl-, and aralkyl-alkoxylates.

In addition to the rejections discussed above, the Office Action has also rejected claim 14, 15, and 17-25 under 35 U.S.C. § 112 first paragraph because of the use of the word “substantially” in claim 14. Applicant respectfully traverses this rejection. Applicant has deleted the word “substantially” from claim 14.

It is respectfully requested that these rejections be withdrawn.

Rejections Under 35 U.S.C. §103(a)

The Office Action has made several rejections under 35 U.S.C. § 103(a) alleging that it would be obvious to a person of skill in the art to combine known raw materials and use them to clean carpets with a reasonable expectation of success and similar results. Applicant respectfully disagrees and points to how successful the present invention is at removing exceptionally tough stains like red KOOL-AID™ that historically are not always removed. To suggest that the prior art raw materials would be capable of removing tough stains like red KOOL-AID™ requires the impermissible use of hindsight. However, Applicant believes that there are technical differences between the present invention and the prior art in addition to the fact that the present invention is not obvious. These differences will now be discussed in greater detail.

Man et al. (U.S. 2003/0087787)

The Office Action has rejected claims 14, 15, and 17-25 under 35 U.S.C. § 103(a) as unpatentable over Man et al. (US 2003/0087787). Applicant respectfully traverses this rejection.

Claim 14 of the present invention now calls out that the composition is free of enzyme. Claim 14 as amended also calls out that the EO/PO copolymer is a reverse copolymer. Applicant believes that these two amendments distinguish the present invention from Man et al. Accordingly, it is respectfully requested that this rejection be withdrawn.

WO 00/24854

The Office Action has rejected claims 14, 15 and 17-23 under 35 U.S.C. § 103(a) as unpatentable over WO 00/24854. Applicant respectfully traverses this rejection.

The Office Action points out that the '854 application discloses the PLURONIC surfactants. Claim 14, as amended, calls out that the EO/PO copolymer is a reverse copolymer. The '854 application does not teach the class of EO/PO copolymers known as reverse

copolymers, where “reverse copolymer” means an EO/PO copolymer where the PO group is on the outside of the molecule. Accordingly, it is respectfully requested that this rejection be withdrawn.

WO 00/24854 in further view of Man et al. (US 2003/0087787)

The Office Action has rejected claims 24 and 25 under 35 U.S.C. § 103(a) as unpatentable over WO 00/24854 in further view of Man et al. Applicant respectfully traverses these rejections.

Applicant believes that the present invention is patentable over the prior art of record for the reasons already described above with respect to WO 00/24854 and Man et al. Accordingly, it is respectfully requested that this rejection be withdrawn.

Summary

It is respectfully submitted that each of the pending claims is in condition for allowance, and notification to that effect is kindly requested. The Examiner is invited to contact the Applicants’ primary attorney-of-record, Anneliese S. Mayer, at (651) 795-5661, if it is believed that prosecution of this application may be assisted thereby.

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PATENT TRADEMARK OFFICE

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